

## Privacy Policy

### “Shop & Fly” Service

#### Pursuant to articles 13 – 14 of EU Regulation 2016/679 (“GDPR”)

Dear Client,

pursuant to articles 13 e 14 of the EU Regulation 2016/679 (“GDPR”), **LS TRAVEL RETAIL ROMA SRL**, as Data Controller, (hereinafter, “**LSTRR**” or the “**Data Controller**”), provides you with the following information regarding the processing of your personal data collected within the “Shop & Fly” service, through which the customer can, by consulting the online catalogue, order the products available at the stores managed by the Data Controller at the international airport “Leonardo da Vinci” in Rome-Fiumicino.

The “Shop & Fly” service is hereinafter referred to as the “**Service**”.

#### 1. DATA CONTROLLER

LS TRAVEL RETAIL ROMA S.r.l., with registered office in Gaggio di Marcon (Venice), Via Fratelli Bandiera, no. 7.

#### 2. DATA PROTECTION OFFICER

LSTRR has appointed a Data Protection Officer, pursuant to article 37 of GDPR, who can be contacted at the following address: [dpo\(at\)lagardere-tr.it](mailto:dpo(at)lagardere-tr.it).

#### 3. TYPES OF PERSONAL DATA PROCESSED

The Data Controller process your personal data directly collected from you, by filing out the online form for the activation of the Service (hereinafter, jointly, the “**Personal Data**”):

- Airline flight data: information about the date, time and flight number to check the available products on the basis of the destination (Schengen or Extra Schengen) and allow the system to automatically set the relevant store;
- Biographical and contact data: first name, last name, e-mail address
- Language preference

#### 4. PURPOSES AND LEGAL BASIS FOR THE PROCESSING

LSTRR process your Personal Data for one or more of the following purposes. In consideration of the legal basis from time to time indicated.

1) “**Shop & Fly**” **service management**: LSTRR process your Data to follow up on your order of the products on the online catalogue, to send you service communication (for example, to report variations of the availability of the products ordered at the stores).

The legal basis of the data processing is the performance of a contract to which you are a part pursuant to article 6, lett. b, GDPR. The provision of the Data is for the use of the “Shop & Fly” service and the denial to provide the Data will prevent the use of the Service.

2) **Purposes related to the obligations under laws, regulations or EU legislation, provision/requirements of competent authorities and/or supervisory and controls bodies**: LSTRR will process your Personal Data to fulfil binding legal obligations.

The legal basis of the data processing is the fulfilment of a legal obligation, pursuant to article 6 par.1, lett. c) of GDPR. The provision of your Personal Data is mandatory, as failure to do so will prevent the Data Controller from fulfilling specific legal obligations.

## **5. MANNER IN WHICH DATA ARE PROCESSED**

The Personal Data are processed in compliance with the regulations in force by means of digital and telematics tools, for the specific purposes indicated above, so as to ensure the security and confidentiality of the data.

## **6. DATA RETENTION**

In accordance with the principle of minimization under article 5.1, lett. c of GDPR, your Personal Data will be kept only as long as necessary to fulfil the purposes for which are collected or for any other legitimate related purposes. Therefore, if the Personal Data are processed for two different purposes, we will retain such data until the longer term - purpose ceases. In any case, we will no longer process Personal Data for that purposes whose retention period has expired.

Personal Data that are no longer needed, or for the retention of which there is no longer any legal basis, will be irreversibly anonymized (and thus can be retained) or safely destroyed.

Processed Personal Data will be retained for no longer than 6 years after the product order, subject to the legal limitation period.

With particular reference to the requests from the authority or the execution of legal obligations, or in the event of judicial protection of our rights, your Personal Data will be retained for as long as necessary to carry out such obligations or fulfilments or to pursue the protection of your right.

## **7. DATA RECIPIENTS**

Within LSTRR, only those individuals appointed by the Data Controller and authorized to carry out the processing activities may acknowledge the Personal Data that you have provided. In addition, your data may be processed i) by the other companies of the Lagardère Travel Retail Group appointed, if necessary, as Data Processors (for purposes of support for the provision of the Service, for administrative, managerial, organizational activities or to enable the Data Controller to comply with legal obligations or orders from authorities); ii) other companies that provide instrumental services for the management of the Service.

You can contact the Data Controller at [dpo\(at\)lagardere-tr.it](mailto:dpo(at)lagardere-tr.it) to request to see the list of data processors and other parties to whom it communicates data.

Personal Data can be communicated to the competent Public Authorities in fulfilment of legal obligations.

In any case, your Personal Data will not be subject to dissemination.

## **8. EXTRA-EEA DATA TRANSFER**

Your Personal Data will not be disclosed and/or communicated to third parties located outside the European Economic Area (EEA).

## **9. RIGHTS OF THE DATA SUBJECTS**

If your request has a legal basis, you have the right to ask the Data Controller:

- a) the access to your Personal Data, pursuant to art. 15 of GDPR;
- b) the rectification or integration of inaccurate Personal Data concerning you, pursuant to art. 16 of GDPR;
- c) the deletion of Personal Data for the processing of which LSTRR no longer has a legal basis, pursuant to art. 17 of GDPR;
- d) the restriction of the processing of personal data, if any of the cases provided for in art. 18 of GDPR shall apply;

e) to obtain the copy of the Personal Data provided to LSTRR, in a structured, commonly used and machine-readable format and the transmission of such data to another data controller (so-called portability), pursuant to Article 20 of the GDPR;

f) the revocation of your consent at any time, if the processing is based on consent. Please note that any revocation of the consent will only take effect with regard to the subsequent processing, not affecting the lawfulness of the data processing carried out prior to such revocation.

Right to object: in addition to the rights listed above, you always have the right to object the processing of your Personal Data at any time. In the event that the right to object is exercised, the Data Controller has the right not to follow-up the request, and thus to continue the processing, if there are compelling legitimate reasons to proceed with the processing that prevail over the interests, rights and reason of the data subject. The foregoing without prejudice to your right to file a complaint with the Data Protection Authority pursuant to art. 77 of GDPR, using the references available on the website [www.garanteprivacy.it](http://www.garanteprivacy.it), or to take appropriate legal action.

The Data Controller shall have the right to update this privacy policy.

Last update

December 2023